

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:	)	
	)	
THE FINANCIAL OVERSIGHT AND	)	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	)	Title III
	)	
as representative of	)	Case No. 3:17-bk-03283 (LTS)
	)	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	)	
	)	
Debtors.	)	

	X	
	)	
In re:	)	
	)	
	)	PROMESA
THE FINANCIAL OVERSIGHT AND	)	Title III
MANAGEMENT BOARD FOR PUERTO RICO	)	
	)	Case No. 3:17-cv-01685 (LTS)
as representative of	)	Case No. 3:17-bk-03566 (LTS)
	)	
THE EMPLOYEES RETIREMENT SYSTEM OF THE	)	
GOVERNMENT OF THE COMMONWEALTH OF	)	
PUERTO RICO,	)	
	)	
Debtor.	)	

-----X

**NOTICE OF FILING OF UNREDACTED DOCUMENTS**

**TO THE HONORABLE COURT:**

**PLEASE TAKE NOTICE:** Pursuant to the provisions of the *Stipulation and Order for the Production and Exchange of Confidential Information* [Docket No. 60 in Case No. 17-ap-00213], Movants,<sup>1</sup> by and through their undersigned counsel, hereby respectfully submit the unredacted versions of the following documents:

1. *Supplemental Brief in Support of Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay*. A redacted version was originally filed at Docket No. 7564 in Case No. 17-bk-03283 and Docket No. 583 in Case No. 17-bk-03566. The redactions remaining in the document are pursuant to the Court's *Order Granting Urgent Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to File Under Seal Unredacted Expert Reports* [Docket No. 7598 in Case No. 17-bk-03283 and Docket No. 588 in Case No. 17-bk-03566].

---

<sup>1</sup> Movants include Andalusian Global Designated Activity Company, Glendon Opportunities Fund, L.P., Mason Capital Master Fund L.P., Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Ocher Rose, L.L.C., Puerto Rico AAA Portfolio Bond Fund, Inc., Puerto Rico AAA Portfolio Bond Fund II, Inc., Puerto Rico AAA Portfolio Target Maturity Fund, Inc., Puerto Rico Fixed Income Fund, Inc., Puerto Rico Fixed Income Fund II, Inc., Puerto Rico Fixed Income Fund III, Inc., Puerto Rico Fixed Income Fund IV, Inc., Puerto Rico Fixed Income Fund V, Inc., Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc., Puerto Rico Investors Bond Fund I, Puerto Rico Investors Tax-Free Fund, Inc., Puerto Rico Investors Tax-Free Fund, Inc. II, Puerto Rico Investors Tax-Free Fund III, Inc., Puerto Rico Investors Tax-Free Fund IV, Inc., Puerto Rico Investors Tax-Free Fund V, Inc., Puerto Rico Investors Tax-Free Fund VI, Inc., Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc., SV Credit, L.P., Tax-Free Puerto Rico Fund, Inc., Tax-Free Puerto Rico Fund II, Inc., and Tax-Free Puerto Rico Target Maturity Fund, Inc.

2. The following exhibits to the *Declaration of Sparkle Sooknanan in Support of Supplemental Brief in Support of Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay* [Docket No. 7561 in Case. No. 17-bk-03283 and Docket No. 578 in Case No. 17-bk-03566]:

- a. Exhibit B
- b. Exhibit E
- c. Exhibit F
- d. Exhibit G
- e. Exhibit H
- f. Exhibit I
- g. Exhibit J
- h. Exhibit K
- i. Exhibit HH
- j. Exhibit LL
- k. Exhibit MM
- l. Exhibit NN
- m. Exhibit OO

Please note that Exhibits QQ and RR, the Expert Report of Faten Sabry, Ph.D., dated May 30, 2019, and the Rebuttal Expert Report of Faten Sabry, Ph.D., dated June 12, 2019, are being filed separately under seal pursuant to this Court's *Order Granting Urgent Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to File Under Seal Unredacted Expert Reports* [Docket No. 7598

in Case No, 17-bk-03283 and Docket No. 588 in Case No. 17-bk-03566]. Exhibits QQ and RR were also filed in redacted form along with the *Declaration of Faten Sabry in Connection with Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay*, that was part of the *Noticing of Filing of List of Declarations and Exhibits* [Docket No. 7556 in Case. No. 17-bk-03283 and Docket No. 575 in Case No. 17-bk-03566].

In San Juan, Puerto Rico, today July 1, 2019.

By:

/s/ Alfredo Fernández-Martínez

Alfredo Fernández-Martínez  
DELGADO & FERNÁNDEZ, LLC  
PO Box 11750  
Fernández Juncos Station  
San Juan, Puerto Rico 00910-1750  
Tel. (787) 274-1414  
Fax: (787) 764-8241  
afernandez@delgadofernandez.com  
USDC-PR 210511

/s/ Bruce Bennett

Bruce Bennett (*pro hac vice*)  
JONES DAY  
555 South Flower Street  
Fiftieth Floor  
Los Angeles, California 90071  
Tel. (213) 489-3939  
Fax: (213) 243-2539  
bbennett@jonesday.com

Benjamin Rosenblum (*pro hac vice*)  
JONES DAY  
250 Vesey Street  
New York, New York 10281  
Tel. (212) 326-3939  
Fax: (212) 755-7306  
brosenblum@jonesday.com

Geoffrey S. Stewart (*pro hac vice*)  
Matthew E. Papez (*pro hac vice*)  
Sparkle L. Sooknanan (*pro hac vice*)  
JONES DAY  
51 Louisiana Ave. N.W.  
Washington, DC 20001  
Tel. (202) 879-3939  
Fax: (202) 626-1700  
gstewart@jonesday.com  
mpapez@jonesday.com  
ssooknanan@jonesday.com

David R. Fox (*pro hac vice*)  
JONES DAY  
100 High Street, Floor 21  
Boston, MA 02110  
Tel. (617) 960-3939  
Fax: (617) 449-6999  
drfox@jonesday.com

*Counsel for ERS Bondholders Andalusian Global Designated Activity Company, Glendon Opportunities Fund, L.P., Mason Capital Master Fund, LP, Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Ocher Rose, L.L.C., and SV Credit, L.P.*

/s/ Alicia I. Lavergne-Ramírez

José C. Sánchez-Castro  
USDC-PR 213312  
jsanchez@sanpir.com

Alicia I. Lavergne-Ramírez  
USDC-PR 215112  
alavergne@sanpir.com

Maraliz Vázquez-Marrero  
USDC-PR 225504  
mvazquez@sanpir.com

SÁNCHEZ PIRILLO LLC  
270 Muñoz Rivera Avenue, Suite 1110  
San Juan, PR 00918  
Tel. (787) 522-6776  
Fax: (787) 522-6777

/s/ Jason N. Zakia

John K. Cunningham (*pro hac vice*)  
Glenn M. Kurtz (*pro hac vice*)  
WHITE & CASE LLP  
1221 Avenue of the Americas  
New York, NY 10036  
Tel. (212) 819-8200  
Fax (212) 354-8113  
jcunningham@whitecase.com  
gkurtz@whitecase.com

Jason N. Zakia (*pro hac vice*)  
Cheryl T. Sloane (*pro hac vice*)  
WHITE & CASE LLP  
200 S. Biscayne Blvd., Suite 4900  
Miami, FL 33131  
Tel. (305) 371-2700  
Fax (305) 358-5744  
jzakia@whitecase.com  
csloane@whitecase.com

*Counsel for Puerto Rico AAA Portfolio Bond Fund, Inc., Puerto Rico AAA Portfolio Bond Fund II, Inc., Puerto Rico AAA Portfolio Target Maturity Fund, Inc., Puerto Rico Fixed Income Fund, Inc., Puerto Rico Fixed Income Fund II, Inc., Puerto Rico Fixed Income Fund III, Inc., Puerto Rico Fixed Income Fund IV, Inc., Puerto Rico Fixed Income Fund V, Inc., Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc., Puerto Rico Investors Bond Fund I, Puerto Rico Investors Tax-Free Fund, Inc., Puerto Rico Investors Tax-Free Fund, Inc. II, Puerto Rico Investors Tax-Free Fund III, Inc., Puerto Rico Investors Tax-Free Fund IV, Inc., Puerto Rico Investors Tax-Free Fund V, Inc., Puerto Rico Investors Tax-Free Fund VI, Inc., Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc., Tax-Free Puerto Rico Fund, Inc., Tax-Free Puerto Rico Fund II, Inc., and Tax-Free Puerto Rico Target Maturity Fund, Inc.*